

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	ET Docket 01-278
Review of Part 15 and other Parts of the	)	RM-9375
Commission's Rules	)	RM-10051
	)	

To: The Secretary

**Request for Extension of Time for Filing Reply Comments**

Invensys Metering Systems ("Invensys") respectfully requests a two week extension of the deadline for the filing of Reply Comments in the above-captioned proceeding, extending the deadline from March 12, 2002 to March 26, 2002.

Invensys Metering Systems ("Invensys") is a leading manufacturer of Automatic Meter Reading devices and systems that use wireless point to point and wireless local area networks. Invensys also actively participates in the IEEE 802.15 Wireless Personal Area Network Standards Working Group, which develops industry standards for systems that operate as unlicensed devices under Part 15 of the Commission's rules, and is a member of the ZigBee Alliance ("ZigBee"), an industry organization that promotes and certifies interoperability of IEEE 802.15.4 WPAN products. Invensys is an interested party in this proceeding.

In their comments filed in this proceeding, XM Radio Inc. ("XM") and Sirius Satellite Radio Inc. ("Sirius") both make sweeping requests for drastic reductions in the long-standing limits on out-of-band emissions allowed for unlicensed devices operating under Part 15 of the Commission's rules. These requests raise a number of complex technical issues with potentially significant impacts on the manufacturers of WLAN equipment and could, if granted, require extensive and costly redesign of entire product lines which currently comply with the Commission's existing rules in all respects.

In order to fully assess the impact of these requests and provide the Commission with the most accurate information possible, Invensys needs the extra time afforded by the requested two week extension of the Reply Comment filing deadline.

The additional time requested will allow Agere to complete the technical analyses necessary to fully evaluate these impacts and prepare appropriate reply comments.

Additionally, while it is not our intention to presume to speak for them, we are aware that colleagues in other companies are also finding it difficult to adequately assess the impact of the changes requested by XM and Sirius and respond in the allotted time. We therefore believe that granting the requested two week extension of time would be in the public interest and would give the Commission the benefit of a more complete record in this proceeding.

Respectfully submitted,

By: /s/  
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